



**Portland General Electric Company**  
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July 22, 2021

***Via Electronic Filing***

Public Utility Commission of Oregon  
Attention: Filing Center  
P.O. Box 1088  
Salem, OR 97308-1088

**RE: Risk-Based Wildfire Protection Plans – PGE Comments on Vegetation Management**

Dear Filing Center,

Portland General Electric Company (“PGE”) appreciates the opportunity to comment in AR 638. During the June 29, 2021 Public Utility Commission of Oregon (“OPUC”) AR 638 Vegetation and System Hardening Workshop, PGE presented information and recommendations concerning vegetation management. Pursuant to OPUC staff’s request, PGE submits the following written comments summarizing our recommendations. PGE can provide the OPUC with a more detailed proposal in the near future, as further Rule Making Workshops are held.

**1. Vegetation Management Audits**

To promote a holistic approach to system hardening and resiliency, PGE recommends that the OPUC increase its vegetation management audit cadence from once a year to three to four times a year for shorter durations. This approach takes advantage of the OPUC’s unique work in the field performing physical audits to increase collaboration and compliance. The benefits of this approach are threefold. First, this approach will give the OPUC greater insight into vegetation during various growth cycles: recently trimmed, upcoming, and mid-cycle. Information gained through increased audit cadence will show the efficacy of the electric utilities’ current vegetation management program and the correlation between prior audit results, cycle timing, and trim specifications. Second, this approach will yield improved data that will assist electric utilities in addressing compliance issues earlier which will result in

increased risk mitigation. Finally, this approach will also provide the OPUC with a clear understanding of how electric utilities use this data to adjust programming and give more opportunities to partner on efforts that will have a meaningful impact on risk mitigation.

Additionally, PGE recommends that the OPUC not make any changes to Oregon Administrative Rule 860-024-0016-Minimum Vegetation Clearance Requirements. Increasing the minimum vegetation clearances will not effectively address the risks this section seeks to mitigate. Instead, implementing mandatory minimum vegetation clearances will encourage minimum compliance, increase costs, and place additional constraints on an already limited labor pool. As currently written, Division 24 provides electric utilities with the discretion to make programmatic decisions based upon data to mitigate risk and allocate resources appropriately. By improving the operationalization of the OPUC Vegetation Audit data, electric utilities can work collaboratively with the OPUC to craft holistic solutions to increase compliance, mitigate risk, and improve system hardening. PGE believes this proposal can positively motivate the industry to achieve data-driven compliance improvements.

## **2. Electric Utility Exemption from Local Permitting Requirements for Pruning or Removal of Vegetation**

In the wake of the historic Labor Day wildfires and the unprecedented winter storms, there has been an increased focus on the electric utilities' pruning or removal of trees off-right-of-way. While Oregon Revised Statute Section 758.284 grants electric utilities immunity from any civil liability for the pruning or removal of vegetation growing on property adjacent to electric facilities so long as the electric utility provides notice to the property owner, this section does not ease the administrative burden of complying with the permitting requirements of local jurisdictions.

Compliance with the various permitting requirements of local jurisdictions is complicated, time-consuming, and unduly burdensome and can hinder the pruning or removal process. To effectively address this issue, PGE recommends an exemption be created from the permitting requirements of local jurisdictions for the pruning and/or removal of within or off-right-of-way vegetation as long as electric utilities work with property owners and act in accordance with OPUC policies. An exemption to local

permitting requirements would remove barriers to timely pruning or removal of vegetation that poses a risk to electric facilities and allow for broadened consideration of pruning or removals requested by property owners. By easing the administrative burden of compliance, electric utilities can be more responsive and agile in mitigating risks to the system.

Respectfully Submitted,

*/s/ W. M. Messner*

William M. Messner  
Director Wildfire Mitigation & Resiliency